

**Commonwealth of Kentucky  
Division for Air Quality**

***PERMIT STATEMENT OF BASIS***

Federally Enforceable Conditional Major Permit, No. F-03-031

Conopco, Inc.

Owensboro, KY.

January 13, 2004

Esmail Hassanpour, Reviewer

Plant I.D. # 21-59-00047

Application Log # 56058

**SOURCE DESCRIPTION AND CONTROL EQUIPMENT:**

A Title V draft permit was issued by Division on September 20, 2003 and advertised on October 8, 2003. However, the comments received from permittee on October 3, 2003, requested the Division to withdraw the Title V draft (V-03-036) and reconsider the application for to Federally Enforceable Conditional Major permit. Additionally, the facility will voluntarily limit the source wide sulfur dioxide (SO<sub>2</sub>) emission to 90 tons/yr.

**INITIAL ISSURANCE:**

A Title V operating permit application was received from Conopco, Inc. on July 3, 2001. The application was deemed administratively complete on September 11, 2003. The facility currently operates under permit number O-88-087. The facility is equipped with two boilers, and processes tomato paste, spices and other food ingredients to make pasta sauces.

The Cleaver Brooks boiler emission unit 1 (EU), and the Nebraska boiler emission unit 2 burns natural gas and uses # 2 oil as a back up fuel. The boilers are rated 54 mmBTU/hr, and 73.1 mmBTU/hr respectively.

**COMMENTS:**

Based on the information provided, 401 KAR 59:015 applies to the boilers. The allowable particulate matter emission limit of 0.30 lb/mm BTU from 59:015 Section 4(1)(c), and the allowable sulfur dioxide emission limit of 1.03 lb/mm BTU from Regulation 59:015 Section 5(1)(c) apply to the boilers.

To preclude 401 KAR 52:020, the source has taken a federally enforceable limit on the oil to be burned at Emission Points 01 and 02. The annual limit of 2717913 gallon/yr of oil burned shall not be exceeded, and hours of operation for # 2 fuel oil shall not exceed 114 days or 2736 hrs/yr.

**REGULATION APPLICABILITY:**

Regulation 401 KAR 59:015, New Indirect Heat Exchangers.

**REGULATIONS NOT APPLICABLE TO EMISSION UNIT 1, AND DUE TO APPLICABILITY DATE OR SIZE OF UNIT:**

401 KAR 60:005, New Source Performance Standards incorporating by reference 40 CFR 60 Subpart Dc, Standards of performance for small industrial-commercial-institutional steam generating units, applicable to an emission unit with a design maximum heat input capacity of 100 mmBTU/hour or less and greater than or equal to 10 mmBTU/hour and constructed after June 9, 1989. Not applicable, because EU 1 installed in September 1975, and EU 2 installed in December 1987.

**EMISSION AND OPERATING CAPS DESCRIPTION:**

To preclude 401 KAR 52:020, the source has taken a federally enforceable limit on the oil to be burned at Emission Points 01 and 02. The annual limit of 2717913 gallon/yr of oil burned shall not be exceeded, and hours of operation for # 2 fuel oil shall be 114 days or 2736 hrs/yr. The SO<sub>2</sub> emission shall not exceed 90 tons/yr.

**PERIODIC MONITORING:**

None

**OPERATIONAL FLEXIBILITY:**

None

**CREDIBLE EVIDENCE:**

This permit contains provisions, which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.